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ABSTRACT

Special Education programs at nine Bureau of Indian Affairs (BIA) schools were investigated to establish and identify priorities for improvement and to determine the effectiveness of each program. The monitoring procedure involved random sampling of files of identified exceptional students and an in-depth examination of the documentation pertaining to each student's referral, placement, and Individualized Education Program. Particular attention was paid to each student's educational environment as a means of determining and justifying the appropriateness of the child's experiences in the classroom and the teacher's methodological approach to service delivery and quantification of results. The investigation took approximately two months and necessitated first-hand involvement of the investigators. Although Special Education programs and service delivery at the BIA schools were generally in compliance with the intent of Public Law 94-142, the degree of acquiescence to federal mandate varied; no school was in complete compliance. Schools should try to attain at least the minimum level of compliance, auditors and program inspectors should be allowed access to the reports, the programs should be evaluated annually, and in-service training programs for staff and administration should be instituted. Individual reports for the nine agency schools are included. (CM)

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A REVIEW OF A B.I.A. AGENCY SPECIAL EDUCATION PROGRAM:

SUMMARY AND REFERENCE

By

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The five plus years that have elapsed since the passage of Public Law 94-142 are filled with the curricular emendations and philosophic restructuring to better accomodate handicapped children and their families. Specifically, entitlement to a free appropriate public education is insured by mandate. States were required to afford this education to all handicapped children by September 1, 1980.

The significance of P.L. 94-142 is realized when its provisions are translated into direct services for handicapped children and their families. The important elements of the law include: (1) A free appropriate public school education, (2) Non-discriminatory testing and assessment, (3) Placement in the least restrictive environment, (4) Preparation of Individualized Educational Programs, (5) Provision of due process procedures, (6) Involvement of families, and (7) Provision of related support services. These imparatives provided the impetus for an external evaluation and prudential investigation of the separate Special Education programs operating at each school within the BIA Agency.

Programs at nine member schools were investigated. This exercise involved the expenditure of approximately two months time and necessitated a first hand involvement on the part of the investigators.

Basis for this monitoring procedure involved the random sampling of files of indentified exceptional students and an in depth examination of the documentation pertaining to each students' referral, placement, and Individualized Education Program (I.E.P.). Particular attention was paid to each students' educational envi-

ronment as a means of determining and justifying the appropriateness of the child's experiences in the classroom and the teachers methodological approach(s) to service delivery and quantification of results.

The premise behind the evaluation procedure was not founded on intrusion or purely negative criticism. The outside methods and standards of the reviewers are of little consequence in this matter, and the inclusion of purely critical data serves to provide little motivation to alter and/or adapt existing programming. The impact of a totally counteractive assessment only serves to evanesce contributory input. The primary reason for monitoring the existing programs was to establish and/or identify priorities for improvement and determine measures of effectiveness. At the root of the entire procedure was the clarification of each programs' objectives and the prioritization of outcome goals and their relationship to the tenets of P.L. 94-142.

Each evaluation was preceded by an informal discussion with school administrators to identify and/or specify the intent of the reviewers and the methodology to be used. Concerns and questions proffered by these persons were addressed fully prior to any files being reviewed. Generally, the administrators at the individual schools were interested in maintaining open lines of communication and promulating more efficient and cost effective programming. In every case, access to student files and availability of staff and faculty for pertinent discussion was practicable.

The inspection of individual student files was precipitated by the teachers willingness to allow the two reviewers the advantage of working in areas away from the classrooms, usually in a lounge or conference room that provided adequate space and facilitated a more informal environment for discussion of cogent materials found in the files or those items omitted from the files that were felt to be requisite to appropriate record keeping.

In light of the informal nature in which the evaluation was taken to closely scrutinize each I.E.P. and documentation associated with the goals and objectives established by the multidisciplinary committees for inclusion in the I.E.P.'s. It was felt that this document was the most important component in each child's programming because it served to establish the annual sequence of events for the student and contained supplemental information, i.e.-parental signatures, committee members, interpreters, etc. directly related to other mandatory documentation.

Content areas of the I.E.P.'s and the multidimensional implications of the evaluation were the first areas investigated. In a substantial number of cases, the child's present level of educational performance was needed but no documentation was available to provide specific evidence of the level assignment. It appeared that arbitrary performance level assignments were made and/or a base point of zero was made to simplify matters. The statement(s) of annual goals again were not documented in terms of how and why they were arrived upon, but the dynamics of the multidisciplinary meeting were hypothetically incumbent

in their development. Statements of specific special education and related services were noted and, in some cases, documentation provided outlining results of extracurricular services such as visual and/or auditory examinations, but specific goals for regular classroom teachers and related service delivery functions were not included and seldom expatiated. The projected dates for initiation and duration of services were in alignment with the normal school calendar and not a point of contention except in those cases where the initiation dates were being ignored. The services were ultimately provided but the documented dates did not reflect the actual program sequence. Appropriate objective criteria and evaluation procedures and schedules as a means of determining and quantifying the completion of short term objectives was found to be wanting in a majority of the files at all schools. With very few exceptions, the individual S.T.E.P.'s were designated as being completed and verified by the instructors signature but proof of completion was omitted. The days of taking the teachers word for such compulsory topics is past and the need to adequately document student performance is upon us, particularly in Special Education classrooms where exceptional students are nurtured and required other than the standard curriculum to succeed.

The I.E.P.'s should constitute the base of all school operations for the exceptional student. This binding document reflects the efforts of a multidisciplinary and, hopefully, ethnologically diverse team convened to determine a list of all services needed by the student for an appropriate education, whether or not the

services are available. The complete I.E.P. provides instructional and administrative staff with a subjective overview of the students needs and also the students current educational status. The I.E.P. can become a tool by which the common goals and objectives of the student can be shared among the various groups and individuals involved with the concerned about his life, i.e.-parents, teachers, support staff, administrators, etc. Communicating individualized needs among the various segments of the educational system is time consuming and sometimes unrealistic but the sharing of responsibilities among the separate groups establishes a system of checks and balances concerned with the legal ramifications of Special Education service delivery and enhances both planning and facilitation of learning.

While the I.E.P. represents the manifest product of the educational community, certain procedural points need to be examined. One such point in need of scrutiny is the provision for prior notice, that is informing the parents of the exceptional child of the intent to place the child in Special Education. This must be done at least three times, must be in writing and must be communicated in the parents primary language. A second point is parental consent. Consent, in the form of the parents signature on requisite documents, is mandatory prior to evaluation and/or placement. Secondary procedural points that may require examination are the facilitation of parent participation in decision making, the opportunity for independent educational evaluation(s), the availability of impartial due process hearings to resolve disputes and mediate findings, client confidentiality, and access to pro-

grams, particularly in terms of architectural access and elimination of barriers. Some of these points relate more to Section 504 of the Vocational Rehabilitation Act of 1973, P.L. 93-112, but are no less pertinent to appropriate service delivery as related to the mandate of P.L. 94-142 and Special Education in general. Individual instances of omission and/or oversight was noted in many of the schools but these problems have been reviewed with staff members and recommendations made pertaining to methods of rectification.

Special Education efforts are not new in American education. The problems associated with redemption are new, however, and certainly pose more complexity to educators than ever before; no longer can redemption be viewed simply as a special problem situation. Improvement in methodology and curricula will not totally solve the problems of each exceptional student. Developmental programs must be holistic in design and implementation if the real student problems are to be addressed.

Given the formula for program explication, every effort needs to be made to ensure minimum standards are met and maintained. Guidelines are explicit and available and therefore, excuses for deficient programming components are not acceptable. Administrators and teachers should be held accountable for their programs. They are the cornerstones of the system and competent performance should be demanded. If a student's I.E.P. is inappropriate, changes should be made and new objectives established in accordance with policy, not some arbitrary assessment based on each facilitation

on the part of the school. The needs of each student are of paramount importance and need to be emphatically underscored.

The attached reports for each of the nine agency schools reflect both the individualized and general recommendations for program emphasis and improvement. Given the recent interest of federal programmers to justify program existance, it is recommended that auditors and/or program inspectors be allowed access to said reports for their perusal and to use the reports as guidelines for program inspection. It is also the belief of the reviewers that a comprehensive inspection of Special Education programs be undertaken annually. A program of in-service training for staff and administration should be instituted throughout the agency to maintain adequate information dissemination and promote participatory management.

Special Education programming and service delivery at schools within the BIA Agency are generally in compliance with the intent of P.L. 94-142. The degree of acquiescence to federal mandate varies but no school has shown the ability to maintain a totally clean slate and every effort should be made to improve, at least to the level of minimum compliance in all phases of programming and service delivery.

APPENDICES A-J

The following nine reports reflect each school's status of compliance with the tenets of P.L. 94-142. Each individual report was provided to school and agency administrators to sepcify the reviewers findings and recommendations.

A REVIEW OF THE SCHOOL A SPECIAL EDUCATION PROGRAM

By

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The Special Education Program of School A was monitored and reviewed on Friday, February 6, 1981.

The reviewers randomly selected eight (8) folders of exceptional students. Concern was given to documentation that verified the school's compliance with P.L. 94-142 and to the academic/behavioral progress of each exceptional student. The established Individualized Educational Program (I.E.P.) were utilized as documentation for this review.

The purpose for this review was to provide an unbiased external observation of Special Education procedures and to offer instructional assistance in areas that need further attention in order to augument programming for the exceptional student population.

OBSERVATIONS

These observations are based on the review of Special Education student folders and the examination of teacher instructional practices.

(1) All folders contained referral documentation but none had supporting evidence indicating reasons for referral.

(2) Of the psychological evaluations reviewed, none exhibited documentation of how the primary language was determined or whether instruments had been administered in said primary language.

(3) There was no indication of where the psychological instruments were located or could be found if inspection was necessary.

(4) Although parents had been informed and had signed off the evaluation associated documentation, there was no date to support whether or not the parent had been communicated within their primary language.

(5) Parents have to be notified at least three (3) times of the multidisciplinary meeting. This has to be recorded and should be done in the parent's primary language.

(6) There are no bi-annual reports to the parents describing the child's progress.

(7) If parents are unable to sign the proper form(s), the thumb print plus the witness and the interpretator must be present.

(8) Documentation in one file indicated the evaluation had been done before the evaluation request form had been signed.

(9) In some folders the I.E.P.'s are the same as the previous year. Does this mean there was no progress made?

(10) Although there was evidence of psychological evaluations in some student files, there was no corresponding I.E.P. to indicate a service plan or associated programming.

(11) There are no goals for regular teachers or dorm personnel.

(12) There are no behavioral goals on the I.E.P.'s. Does this mean that none of the children have behavioral problems?

(13) There are no reports showing what took place at the multidisciplinary meeting, i.e.-who was present, who was in agreement/disagreement, whether the parent was informed of the proceedings in their primary language.

(14) One psychological evaluation indicated a placement while the I.E.P. shows another. There needs to be some form of documentation indicating why the placement was changed.

(15) There are no Pretest-Posttest sequence to verify the child's yearly progress.

(16) Generally, the eight (8) folders revealed that some students had been evaluated several years prior to being serviced. Why?

(17) Some forms were not completely filled out or did not have all of the required signatures.

(18) Little information about vision and hearing results were to be found in the individual files.

The reviewers did not have an opportunity to discuss programming the established I.E.P. with the Special Education Teacher because she was ill. However, discussions were held with the Special Education Aide. The Aide indicated that the exceptional student was being served, but no documentation was being kept to support the child's progress. Further it was revealed that some I.E.P. goals were being aggressively undertaken, while others were not. This raises the question of the appropriateness of the goal or the reasons for not teaching the goal.

CONCLUSIONS

Based upon the one day review of selected exceptional student folders and teacher/aide records, it would seem that School A is attempting to meet the academic needs of the Special Education students. For the most part, the folders contain the necessary documentation required for the P.L. 94-142. However, some students were evaluated two years prior to actual program involvement and this raises some question about appropriate placements. Also, at least one student was evaluated before the parent gave permission, a violation of both right and statute. Although parent signatures are present, one has to ask if the parent was informed of the Special Education process in their primary language.

Teacher and aide documentation of their instructional practices needs to be improved and parents need to be more accurately informed of what is being done with their child.

RECOMMENDATIONS

It is the recommendation of these reviewers for School A Special Education Program to institute the following:

(1) Become more aware of detail when filling out forms or obtaining signatures for documentations.

(2) Take notes during the multidisciplinary meeting.

(3) Ensure that parents are informed of all Special Education procedures in their primary language.

(4) Provide some written indication as to why students were evaluated but not serviced for a period of time.

(5) Administer a Pretest-Posttest sequence annually to each exceptional student to verify progress and goal attainment.

(6) Teacher and/or aide should document the child's completion of I.E.P. goals and objectives.

(7) All I.E.P. goals be addressed or removed through appropriate means.

(8) Remediate the documented problems in the future (see previous notes).

A REVIEW OF THE SCHOOL B SPECIAL EDUCATION PROGRAM

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On January 30, 1981 the Special Education Program at School B was reviewed. The reviewers randomly selected ten (10) student folders. Pertinent documentation facilitating compliance with P.L. 94-142 was closely scrutinized. In addition, evidence of academic and behavioral progress as determined by the objectives of the Individualized Educational Program (I.E.P.) were closely reviewed.

The purpose of this monitoring procedure was to provide an unbiased external evaluation Special Education procedures and to offer methodological assistance in unidentified areas to augument existing services to exceptional children and provide impetus to innovative programming in the near future.

OBSERVATIONS

The following observations are based on the review of student files and discussions with Special Education instructional staff. Alignment with the I.E.P.'s was emphasized and documented. The following situations were ascertained:

(1) Of the selected files, many of the psychological evaluations were approaching their expiration dates.

(2) Although primary language was noted in the text of the evaluations, no specific method of determination was documented.

(3) Documentation pertaining to recommended physical examinations, i.e.-auditory, visual, etc. was omitted in some cases.

(4) Referral forms did not contain supporting documentation to justify inferences, i.e.-present level(s) of educational performance.

(5) Parental consent forms were generally signed and witnessed, there was not evidence of primary language communication and/or finite explanation of the procedures involved.

(6) Bi-annual reports reflecting student progress were included in the files of the elementary students but were, absent from the middle school and high school students files.

(7) Documentation pertaining to the multidisciplinary meetings was sketchy and, in many cases, totally uninformative rosters of participants were maintained but little evidence of topical discussions were included in the files.

(8) Records of placement need to be expanded to include: date of placement, participants agreements and/or disagreements with the placement or conditions of the placement, perquisite placement data.

(9) Academic goals were indicated on the I.E.P.'s but few behavioral goals were documented or even alluded to. Little supporting data was included to indicate how/why said objectives were specified.

(10) Related services were indicated but no goals or objectives were documented.

(11) Regular classroom placements were indicated but no goals or objectives were documented.

(12) Few folders contained previous the years I.E.P.'s giving rise to questions pertaining to goal determination, educational level, etc.

(13) Evidence of an annual pretest/posttest sequence or some quantifiable method of determining student achievement was not included in files.

(14) Documentation indicating completion of individual S.T.E.P.'s was good in the elementary files but non-existent in the middle school and high school files. Specific tools, methods, etc. used to determine S.T.E.P. completion needs to be documented and/or included in the individual files.

(15) Aside from the 1980-81 I.E.P.'s, the files for the middle school and high school students contained no relevant documentation. The files were not in compliance and were inadequate for realistic programming or instruction.

A sampling of the selected I.E.P.'s were discussed with the Special Education teacher at each school.

The elementary school teacher was generally working within the limits of the I.E.P.'s, was following prescribed documentation procedures, and maintaining samples of student work as evidence of I.E.P. goal completion. Considering the fact this teacher had not been included in the I.E.P. formulation, the overall implementation was satisfactory. The need for supplemental documentation was discussed and specified and the teacher's concerns about individual students programming was addressed.

The middle school/high school teacher was found to be working in a somewhat less conclusive environment. The files sampled were totally inappropriate and it appeared that little real program

related work and/or instruction had been initiated. Discussion revealed the teachers concerns over his function as a teacher versus the need to do in-take related functions as mandated by school administration. The I.E.P.'s were, according to the teachers, totally unappropriate and did not reflect each student's true capabilities. Again, the fact that this particular teacher did not participate in I.E.P. formulation is significant but does not justify the teachers reluctance to call another multi-disciplinary meeting to adapt the I.E.P.'s and/or write new I.E.P.'s in accordance with realistic standards.

Generally, the files sampled were in need of updating and, in some cases, required total reworking. The need for supplemental documentation, although significant, did not appear to effect the general performance of prescribed functions in the elementary school. The middle school/high school program did not appear to be involved in much direct service delivery and is in need of closer evaluation and administrative/faculty involvement.

CONCLUSIONS

Based upon the one day review of student files and associated discussions with Special Education staff, it is the opinion of these reviewers that School B is not in compliance with the tenets of P.L. 94-142. The need for a broad based revitalization of the Special Education Program is evident. It is easy to make general statements pertaining to matters of federal compliance given the vague and effusive language prevalent in legislative dialogue. However, certain specific matters pertinent to P.L. 94-142 need

to be addressed. Evidence of specific statutory conflict at School B appears in the following areas: (a) placement in the least restrictive environment-the elementary teacher questioned the appropriateness of at least one placement, (b) non-discriminatory testing and assessment-primary language determination, (c) preparation of I.E.P.'s the forms have been completed but the appropriateness and/or adequacy are questionable, and (d) provision of related services-this may in fact be occuring but no evidence is included and it appears that related services are determined arbitrarily and without specific objectives.

The School B Special Education Program has been beset by a myriad of problems, both personnel related and programmatically affective. The excessive staff turn over rate has had the effect of forcing teachers unfamiliar with the System into implementing programming they did not formulate and/or are in disagreement with. Specifically, the middle school/high school teacher was employed in January 1981. The need for program implementation has been slowed by periods of orientation, related administrative demands, and lack of familiarity with the system. This kind of self depricating policy has created a problem of substantial proportions and extensive inner-directed assessment and examination.

RECOMMENDATIONS

(1) Review the overall Special Education Program and determine methods for constructive programming.

(2) Take precautions to ensure the participants primary language is used to communicate information and explain procedures.

(3) Monitor the I.E.P.'s to determine the extent of alignment and compliance with established goals and objectives.

(4) Establish and utilize a quantifiable method of achievements determination.

(5) Pay greater attention to detail, particularly in the completion of forms.

(6) Use previous I.E.P.'s as reference materials and as resources for determining current I.E.P. objectives, goals, performance levels, etc.

(7) Address and remediate previous recommendations for change.

A REVIEW OF THE SCHOOL C SPECIAL EDUCATION PROGRAM

By

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On February 13, 1981, the Special Education Program at School C was reviewed. The monitor randomly selected eight (8) exceptional student folders. Documentation facilitating compliance with P.L. 94-142 was closely scrutinized with evidence of academic behavioral progress, as determined by the objectives of the Individualized Educational Program (I.E.P.), closely reviewed.

The purpose for the monitoring procedure is to provide an unbiased external evaluation of Special Education procedures and to offer methodologies that assist in augumenting existing services to exceptional children.

OBSERVATIONS

The following observations are based on the review of eight (8) randomly selected exceptional student folders and discussions with Special Education personnel. Alignment with I.E.P., implementation was observed and documented. The program observations are:

(1) The psychological evaluations do not have indications of where the instruments are kept if inspection is necessary.

(2) The determination of the child's primary language needs to be based upon valid data.

(3) There are no completion of objectives indicated on previous I.E.P.'s.

(4) No data that support whether and/or how parents were contacted for necessary meetings is present.

(5) There are no goals by regular teachers even though students are being mainstreamed.

(6) There are no behavioral goals on any of the children.

(7) There are no physicals, i.e., vision and hearing, screening data available.

(8) There are no data supporting referral inferences.

(9) This years I.E.P. seems to be different from last years I.E.P.'s

(10) One child is in speech. Is this apart of Special Education? Clarification is necessary for children who only have a speech problem.

(11) Not all folders have previous I.E.P.'s. This brings to question how the present I.E.P. was constructed.

(12) One child seems to be out of Special Education. However, there is no supporting data that indicated or validates this removal.

(13) In one folder, there is a I.E.P. for speech, but no evaluation is present. How was this I.E.P. determined?

(14) Multidisciplinary meetings need to be documented more accurately.

Discussion with the Special Education Teacher revealed that no documentation was being kept on the completion of the I.E.P. objectives. However, although little data was kept, objectives seem to be taught, for upon additional discussions, the teacher provided evidence to show students are progressing.

This reviewer has questions about why some I.E.P.'s are different this year from previous years. Also, why are some I.E.P. goals being taught while others are not. These questions are based upon the purpose of the I.E.P. in that this yearly

projection is what the child needs to augument instruction that is beneficial to their education.

CONCLUSIONS

Based upon the one day review of eight (8) randomly selected exceptional student files and discussions with Special Education personnel, it would seem that School C is attempting to meet the purpose of P.L. 94-142, however, due to inadequate record keeping, data is not available for justifying the student's progress. Many I.E.P.'s do not indicate the child's progress from year to year. Further, there is not supporting data to justify the completion of I.E.P. goals and objectives; a process that is paramount for the writing of future I.E.P.'s.

The Special Education Teacher is the strength of the program. However, the teacher seems to be responsible for too many components of P.L. 94-142 which may be the cause for poor record keeping or minimal supporting documentation.

RECOMMENDATIONS

The reviewer wishes to recommend the following:

(1) The program be reviewed and the Special Education Program be freed up from activities that take away from I.E.P. implementation.

(2) A yearly Pretest/Posttest be administered to validate student progress.

(3) Parents be communicated with in their primary language.

(4) Bi-annual reports be given to the parents and based upon the child's I.E.P. direction.

(5) Psychological instruments be made available for inspection.

(6) Valid instrumentation be provided for the determination of the student's primary language.

(7) Documentation be provided for the completion of I.E.P. goals and objectives.

(8) Regular teachers and support personnel be held more accountable for the child's progression.

(9) The observations previously mentioned be remediated.

(10) In the case of the child who is receiving only speech, clarification is needed to see whether Special Education labeling is appropriate.

A REVIEW OF THE SCHOOL D SPECIAL EDUCATION PROGRAM

By

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On February 20, 1981, the Special Education Program at School D was reviewed. The monitors reviewed all of the student folders available, including those on referral status only. Pertinent documentation facilitating compliance with P.L. 94-142 was closely scrutinized. In addition, evidence of academic and behavioral progress as determined by the objectives of the Individualized Educational Program (I.E.P.) were closely reviewed.

The purpose of this monitoring procedure was to provide an unbiased external evaluation of the special education procedures and to offer methodological assistance in identified areas to augument existing services to exceptional children and provide impetus to innovative programming in the near future.

OBSERVATIONS

The following observations are based on the review of student files and discussions with special education instructional staff. Alignment with the I.E.P.'s was emphasized and documented. The following situations were ascertained:

(1) Placement signatures were missing from requisite forms

(2) No supporting documentation indicating reason(s) for referral was evident.

(3) There was no evidence to indicate three (3) efforts had been made to contact parents about a forthcoming multidisciplinary meeting.

(4) Only two files contained I.E.P.'s the remaining files were for referral only.

(5) The I.E.P.'s are not being utilized for instructional procedures and therefore, are invalid.

(6) There is no supporting data to indicate completion of objectives.

(7) A former student has been placed at the Arizona School for the Deaf and Blind in Tucson. Some kind of determination needs to be made to establish monitoring and follow-up procedures for this student.

(8) In one case, the I.E.P. was completed in November but no objectives for the remainder of the year had been written.

(9) An annual pretest/posttest sequence needs to be established to serve as a measure of student progress.

(10) Bi-annual reports to parents reflecting student progress need to be included in the files and/or documented.

(11) No documentation pertinent to the multidisciplinary meetings was present.

(12) Most of the behavioral observations were made by a paraprofessional rather than a teacher.

(13) It appears that most of the documentation, i.e.- observations of tutors, student case workers, etc. are extremely recent and do not reflect the total year to date status of the students.

The two files containing I.E.P.'s were discussed with the special education staff member and adjunct faculty member. Generally speaking, it appeared these staff members were ill informed about the curricular implications of I.E.P.'s and unconcerned about realistic implementation of same. The I.E.P.'s were being ignored, requisite documentation was being ignored,

and in two cases, no special education services were being provided. These two students had become reinvolved in regular programming but no documentation of any kind was available to explain or justify this move. Overall the files were in need of a great deal of work just to bring them to a point where contemporary programming could be initiated.

CONCLUSIONS

Based upon the one day review of student files and the discussions with staff members, it is the opinion of these reviewers that School D is not in compliance with the standards and tenets of P.L. 94-142. The need for a broad based revitalization of the entire special education program is evident. The flagrant disregard for federally mandated service delivery systems by the staff belies the very foundations of education. Certainly there are a number of contributing factors to this deficient programming, not the least of which are the high rate of staff turnover and subsequent gaps in service delivery due to divergent curriculum philosophies. However, it appears that the exceptional student is not being adequately served by the Rock Point System and the liabilities for this action would seem to be directly attributable to the instructional staff.

RECOMMENDATIONS

(1) Review the entire special education program and determine methods to more adequately serve the eligible participants.

(2) Utilize the I.E.P.'s and the principles associated with their implementations. This entire procedure from referral to placement needs to be addressed, revised, and seriously administered.

(3) In-service training for all staff involved with exceptional children needs to be initiated, particularly in the areas facilitating compliance with P.L. 94-142.

(4) Establish and utilize a quantifiable method of determining student achievement and include this in student files.

(5) Administration should become more involved in matters pertinent to federal compliance and realistic service delivery to students.

A REVIEW OF THE SCHOOL E

SPECIAL EDUCATION PROGRAM

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On January 23, 1981, the Special Education Program of the School E was monitored and reviewed. The process involved the random selection of thirty-six (36) student folders from a total population of fifty-five students. Every effort was made to concentrate on documentation designed to facilitate compliance with P.L. 94-142 and to the academic behavioral progress of each exceptional student. Each Individualized Educational Program (I.E.P.) was scrutinized to determine current educational status, objectives, progress and applications of the I.E.P. pertinent to Special Education classroom experiences.

The purpose for the review was to provide an external observation of the School E Special Education procedures and to offer instruction assistance in those areas identified as needing attention and/or clarification in order to augument programming for the exceptional student.

OBSERVATIONS

The following observations are based on the review of thirty-six randomly selected Special Education student folders and related discussions with the Special Education Teachers pertinent to instructional procedures utilized to attain the established student goals of the Individualized Educational Program (I.E.P.).

(1) Of the randomly selected folders, many of the psychological evaluations were approaching the expiration date.

(2) None of the psychological evaluations indicated that the child's primary language had been determined or

that the evaluation was administered in the child's primary language.

(3) Several of the psychological evaluations and speech evaluations were not signed by the evaluator.

(4) The referral forms did not contain supporting documentation to justify the inferences drawn. In addition, some rating dates were missing and signatures omitted.

(5) Although parent consent forms were present and signed, no data indicated whether the parent had been informed about the evaluation process or the reasons for referral in their primary language.

(6) There are no bi-annual reports indicating student progress and/or whether the I.E.P. had been given to the parent(s) for review within appropriate timelines.

(7) Parental rights signatures are available; but there is no documentation indicating that parents were informed of their rights in their primary language.

(8) There is notification of multidisciplinary meetings. However, all notifications are in English which may present a problem for parents who are not able to read English or secure a person to translate.

(9) There are some summaries of the mulitidisciplinary meeting, but they are too short and often inconclusive. Also, documentation should be available indicating whether the meeting was conducted and or translated in the parent's primary language.

(10) Records of placement need to be expanded to include: date of placement members present, who agree-disagreed with the placement, and how placement was determined.

(11) Most I.E.P.'s have academic goals but few behavioral objectives. There is no supporting data indicating how/why these behavioral objectives were established.

(12) Related services need to have goals and objectives stated and documentations included on each I.E.P.

(13) Regular class teachers have no goals and objectives for exceptional students being mainstreamed.

(14) Some folders do not have all/any I.E.P.'s from previous years.

(15) Present I.E.P.'s are not in cohesion with past I.E.P.'s i.e.-do not reflect successes, failures, achievements, etc.

(16) Many folders do not have any screening results reflecting the child's vision and auditory status.

(17) Although there is documentation verifying that parents have been informed of their rights, there is no indication that these rights were explained in the parents primary language.

(18) No annual pretest/posttest sequence was evident in the students files. This is requisite to valid determinations of progress.

(19) No evidence of location of evaluation instruments was found in the files.

Teaqhers are not dating the initiation of each objective or the completion of each objective. No data verifying the child's performance level(s) has been maintained in each file. Evidence of any supporting documentation was not apparent.

In reviewing a sampling of the randomly selected I.E.P.'s with the Special Education Teachers, it was determined that the I.E.P.'s were not being met. One teacher had the same I.E.P. this year as they did the previous year, though they had signed off that all objectives had been completed. Another, felt the I.E.P. document process was not designed to meet each child's needs and, therefore, was providing instruction in areas she determined to be relevant and important. Objective (STEP) beginning dates were not present and no objectives documentation was available to justify the students performance.

Instruction is being provided and the Special Education Teachers of School E are taking steps to adequately serve each student. However, much of their programming cannot be identified with the stated objectives on each students established I.E.P. To these reviewers, there seems to be a flaw in the educational process which is creating inadequate instruction and inappropriate service delivery to students.

CONCLUSION

Based upon the one day review of thirty-six (36) student folders, teacher instructional practices and methodologies used for the completion of the stated I.E.P. objectives, it would seem that School E Special Education Program is not meeting the

needs of the exceptional student. Although the folders indicate some minimal compliance with the P.L. 94-142 mandate, teacher/administrator execution of the intent of the I.E.P.'s are in question. Of the teachers interviewed, none had implemented standard instruction to address I.E.P. objectives and I.E.P. goals were not being adhered to. However, each teacher was providing instruction to students that resulted in learning taking place. Therefore, it would seem that there is something wrong with the Special Education delivery system, particularly as related to I.E.P. determination and implementation.

RECOMMENDATIONS

It is the recommendation of these investigations that School E take the following actions:

(1) Review its present Special Education process and adjust those practices that are causing problems.

(2) Ensure that parents are better informed of their child's performance. Emphasis should be placed on primary language communication.

(3) Monitor the individual Special Education Teacher's I.E.P.'s to see whether they are addressing the established goals.

(4) Have Special Education Teachers, regular teachers, and support personnel document the student's progress and/or the completion of objectives (STEPs)

(5) Administer a Pretest/Posttest sequence to validate student progress.

(6) Become more aware of detail when filling out forms or getting signatures for the documentation.

(7) Compare past I.E.P. objectives and achievements with present I.E.P.'s to ensure viable student objectives.

(8) Remediate the already mentioned observations in the future (refer to previous recommendations).

A REVIEW OF THE SCHOOL F SPECIAL EDUCATION PROGRAM

By

Dr. Carl Foster
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On February 13, 1981, the Special Education Program at School F was reviewed. The monitors randomly selected eleven (11) exceptional student folders. Documentation facilitated compliance with P.L. 94-142 was closely scrutinized with evidence of academic/behavioral progress, as determined by the objectives of the Individualized Educational Program (I.E.P.), closely reviewed.

The purpose for the monitoring procedures is to provide an unbiased external evaluation of Special Education procedures and to offer methodoligies that assist in augumenting existing services to exceptional children.

OBSERVATIONS

The following observations are based on the review of eleven (11) randomly selected folders of exceptional students and associated discussions with Special Education instructional personnel. Alignment with I.E.P. implementation was observed and documented. The program observations are:

(1) No where on the psychological evaluations were specific instruments indicated or maintained.

(2) Many psychological evaluations show the child's primary language, but do not have supporting instruments that provide valid evidence.

(3) There is no supporting documentation for the referral.

(4) The school needs to provide data that indicate that vision and hearing have been screened.

(5) Although parental rights, evaluation, etc. have been signed, there is little in the folders to show that

the appropriate information was given to the parent in their primary language.

(6) There are no multidisciplinary meeting summaries. The school must provide information as to who was present, what was discussed, and what and/or who decided conclusions.

(7) We question whether Special Education and Title I procedures can be used for the exceptional child. Written clarification from the agency is necessary.

(8) No bi-annual reports are present. Twice a year, parents need to be made aware of the progress of their child.

(9) There are no goals and objectives for the regular teacher and/or support personnel, even though the child is mainstreamed.

(10) The reviewer questions whether the child with a speech problem should be classified as Special Education. Clarification in writing needs to be obtained from agency.

(11) There are no previous I.E.P.'s for the T.M.H. child. How did the present I.E.P. evolve and, what was done for the T.M.H. child previously?

(12) There are no behavioral objectives on the I.E.P. None of the children have behavioral problems?

(13) There is no data showing goal or objective completion in the folders for previous I.E.P.'s.

A sampling of the randomly selected I.E.P.'s were discussed with the Special Education personnel. In call cases the Special Education Teachers, Aide and Supervisor were meeting the instructional direction of P.L. 94-142.

CONCLUSIONS

Based upon the one day review of the exceptional students files and discussions with the School F Special Education staff, it is in the opinion of these reviewers that the exceptional student is receiving a fine program. School F's Special Education procedures seem to be the finest in the Chinle Agency, and should be utilized as a model program. All personnel connected with the exceptional child should be ackowledged for their outstanding work and fine instruction.

RECOMMENDATIONS

The reviewer wishes to recommend the following:

(1) That a yearly Pretest-Posttest be administered to validate student progress.

(2) That the primary langauge of the child be determined in a valid manner.

(3) That psychological instruments used be made available for inspection-if necessary.

(4) That documentation be provided for objective completion.

(5) Regular teachers and support personnel be held more accountable for the child's progression.

(6) That parents be informed, twice a year, and in their primary language about their child's progress.

(7) That the observations, previously mentioned, be remediated.

A REVIEW OF THE SCHOOL G
SPECIAL EDUCATION PROGRAM

By

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Wirt B. Twitchell
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The Special Education Program of School G was monitored on February 6, 1981. The reviewers selected fifteen (15) files of exceptional students. Concern was given to documentation that supported the school's compliance with P.L. 94-142 and to academic/behavioral progress of each exceptional student, as determined by the established Individualized Education Program (I.E.P.)

The purpose of the review was to provide an unbiased external observation of the Special Education procedures and to offer instructional assistance in topical areas that need further attention in order to augument programming for the exceptional student.

OBSERVATIONS

These observations are based on the review of fifteen (15) randomly selected Special Education student folders along with the examination of teacher instructional practices. The following was ascertained:

(1) Some students are being serviced by both the Special Education and Title I. This dual service program may be in conflict with the intent of both programs.

(2) Several students are being serviced in special education but no data is evident to indicate they should be. These students are transfers but the data has not arrived from the previous school to support the I.E.P. and/or the placement.

(3) Some folders have raw psychological data but no formal summary and/or interpretation. It raises the question of how placement and I.E.P. were made.

(4) Little data is in the folders pertinent to the student's vision and/or hearing problems.

(5) Some folders have no justifying placement. The forms are present but there are no signatures or placement checked.

(6) A few evaluations are very close to expiration and in need of re-evaluation. Validity of the current I.E.P. is questionable.

(7) In several cases students have signed their own I.E.P.'s and other placement forms. They seem to be of legal age to do this, but propriety is questionable.

(8) There are some folders that do not have previous years I.E.P.'s present. Indications of each child's progress are difficult to ascertain without supporting documentation.

(9) There is no documentation that supports referral.

(10) There is no indication that the child's primary language has been determined or that the psychological instruments were administered in the primary language.

(11) There is no written form suggesting where the evaluation instruments are located if inspection is necessary.

(12) There are no goals and objectives for the regular teachers or support personnel on the I.E.P.'s.

(13) There is little date indicating whether or not the goals or objectives have been completed.

(14) Although parent permission forms have been signed and their rights explained, there is no evidence to indicate that this was communicated to them in their primary language.

(15) There are no bi-annual reports to indicate each child's progress in accordance with the I.E.P. given to the parents.

(16) There are no behavioral goals for children placed as emotionally handicapped.

(17) There is no information about the multidiscipinary meeting: who was present, what was discussed, or if the parent was informed in their primary language as to the proceedings.

(18) Some previous I.E.P.'s reflected a two year implementation plan. This is in violation of the I.E.P. procedures.

(19) There are no Pretest-Posttest sequence to validate each childs progress.

(20) One I.E.P. was filled out prior to the multidisciplinary meeting. The student had to be placed in Special Education classes prior to the meeting also.

(21) There was no psychological evaluation or placement forms in one folder.

(22) There was documentation that parents were informed of the multidisciplinary meetings, but there was no documentation that this process was done in their primary language.

Due to the late hour, the reviewer had only brief opportunity to discuss the programming of one student with the Special Education Teacher. Upon the review of the one child, it is evident that the Special Education Teacher is outstanding and is aggressively attempting to promote viable instruction for the exceptional student. However, the Special Education teacher revealed that only certain parts of the child's I.E.P. was being addressed. This brings up the question of whether the goals that were not taught are appropriate or if the entire I.E.P. is at all appropriate. Also, the goals that are being focused in on reading which may indicate that the child may only need a reading program. Supporting documentation is being kept by the teacher, but is not being kept by the teacher, but is not being recorded on the proper forms, an error perhaps of a neophyte.

CONCLUSIONS

Based upon a one day review of the randomly selected folders and a discussion with the Special Education Teacher, it would seem that School G is attempting to meet the diverse instructional needs of the Special Education student. However, because of the data

missing in some of the folders and their reliance on Title I, the Special Education instruction may not be appropriate. Many folders do not have the necessary data to support placement on I.E.P. construction which may cause programming to be out of compliance with P.L. 94-142's intent. Although proper signature and forms are present, there are no indications that parents were communicated with in their primary language or that they understood what was taking place. Further, this investigation has to question how the I.E.P. was written for one transfer student when there is no supporting data specifying the child's placement or previous progress. Also, if children had been evaluated previously, why haven't they been serviced until this year?

As a first year program, School G is attempting to comply with P.L. 94-142. Its strength is the Special Education Teacher who sppears to be doing an outstanding job. A major weakness seems to be in not fully understanding how these various processes promote I.E.P. implementation.

RECOMMENDATIONS

It is the recommendation of these reviews that School G's Special Education Program:

(1) Review all of its folders in detail and make the appropriate adjustments.

(2) Seek clarification on their present utilization of Title I for Special Education programming.

(3) Become more aware of detail when filling out forms or obtaining signatures for documentation.

(4) Provide viable documentation which supports the completion of the I.E.P. goals or objectives.

(5) Administer a Pretest-Posttest sequence to validate I.E.P. progress.

(6) Ensure that parents are continually informed in their primary language concerning progress and involvement.

(7) Remediate the problems that have been pointed out in the previous pages of this report.

(8) Become more aware of and informed about P.L. 94-142 mandates. This should involve both internal and external in-service training and follow-up.

A REVIEW OF SCHOOL H
SPECIAL EDUCATION PROGRAM

By

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On January 19, 1981, The Special Education Program at School H was reviewed. The reviewers monitored seven (7) student folders. Primary emphasis was given to documentation requisite for compliance with P.L. 94-142 and to the academic/behavioral progression of the exceptional student; as determined by the established Individualized Education Programs (I.E.P.'s) of the School H Special Education Program.

The purpose for the review was to provide and unbiased external observation of Special Education procedures and to offer instructional assistance in areas in need of further attention to augument programming and instruction for exceptional students.

OBSERVATIONS

These observations are based on the review of seven (7) Special Education student folders. Instructional processes utilized by the teacher to attain the established student goals of the Individualized Education Program (I.E.P.) were also examined.

(1) Of the seven (7) folders reviewed, all are nearing the re-evaluation date. One folder had a parent consent for evaluation form dated after the evaluation had been perfomed.

(2) On many referral forms, some signatures were missing and a few of the rating dates were excluded. In addition, there was no supporting documentation justifying reasons for referral.

(3) Although parent consent forms for student evaluations were available and signed, there was no data indicating the process was explained to the parent in their dominate language or that they understood what was to take place.

(4) No where on the evaluations was it indicated whether the child's primary language had been determined or that the evaluation was administered in the child's primary language.

(5) In none of the folders, was there data verifying that the multidisciplinary meeting had taken place, who was present, on what day it was held and what was discussed. Additionally no documentation was available verifying that the parent, if present, had been informed of the multidisciplinary process in their primary language.

(6) None of the folders contained data showing that a bi-annual report of the student's I.E.P. related progress had been submitted to the parent.

(7) Placement forms were present, but there was not supporting evidence documenting how the placement was made, who made the placement, and who, if anyone, disagreed with the placement, and what date the placement was made. Some forms were not fully completed.

(8) Existing I.E.P.'s had in some cases, no dates indicating when they had been filled out. Signatures of officials, i.e.-principal and/or parents, were missing on some I.E.P.'s and no documentation was present verifying the fact that parents had been contacted at least three times about the I.E.P. development meeting. There was no supporting data indicating whether the objective(s) (STEP) had been completed.

(9) Some folders did not have previous I.E.P.'s. These are necessary to document student progress in the Special Education environment.

(10) Although documentation was showing that parents were informed of their rights and signed the required forms, no data was available to indicate whether the parent had had these rights explained in their primary language.

(11) No where on the present I.E.P.'s was there any indication of regular teachers goal responsibility or the attainment of said goals. No supporting documentation pro or con was available.

(12) At the completion of a S.T.E.P. objective, the Special Education Teacher has not provided documentation verifying the level of student performance for the objective.

(13) There was no documentation of physical examination in some of the student files, i.e.-auditory exams, vision tests, etc.

(14) Goals and objectives for related services/departments were not documented on the individual I.E.P.'s.

(15) There was no indication of a formal pretest-posttest sequence and no documentation of intent.

(16) Evaluation findings were not readily verified and instruments were not available for study. No notations outlining evaluation specific data, and/or where the evaluations had been maintained was evident.

Because the Special Education Teacher had to return to Pinon; the reviewer was not able to discuss the instructional procedures utilized in meeting the established I.E.P. goals. However, the reviewer was able to monitor the Special Education Teacher's objectives (STEP's) for the seven (7) students. Based upon the objective beginning and ending dates, it would seem that one student was being serviced at all and others seemed to be progressing slowly. Upon discussing these problems with the teacher supervisor, it was learned that the student possibly not being serviced was not in attendance regularly and questions were raised concerning the paucity of services and whether School H was the most appropriate placement for that student. It was also indicated by the

Teacher Supervisor that the Special Education Teacher was on loan from another school necessitating a great deal of travel and expense.

CONCLUSION

Based upon the one day review of student folder and teacher records, it would seem that School H Special Education Program is meeting some of their exceptional student needs. For the most part, the folders have the necessary documentation required under the P.L. 94-142 mandate. Teacher availability, however, seems to be a problem which is creating the present reduction in instruction and services. Concerning the one student who appeared not to be receiving any services, another placement would seem to be more appropriate.

RECOMMENDATIONS

It is the recommendation of these investigators for School H Special Education Program to:

(1) Employ a full time Special Education Teacher, or arrange for the present Special Education Teacher to have more time with the students.

(2) Initiate more activities to ensure that parents adequately know and understand the Special Education process.

(3) Have Special Education Teachers, regular teachers, and support personnel provide beginning and exit dates along with documentation of completed objectives (STEP).

(4) Administer a Pretest-Posttest sequence annually to each exceptional student to validate progress and goal attainment.

(5) Become more aware of details when filling out forms or obtaining signatures for the documents.

(6) Make sure I.E.P.'s are goal progressive and build upon previously determined objectives.

(7) Remediate the documented problems in the future (see previous notes).

A REVIEW OF SCHOOL J
SPECIAL EDUCATION PROGRAM

By

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On January 19, 1981, The Special Education Program at School J was monitored and reviewed. The reviewers randomly sampled ten (10) student folders. Emphasis was given to documentation that was necessary for compliance with P.L. 94-142 mandates and to the academic/behavioral progress of exceptional students. Established Individual Education Programs (I.E.P.) of the School J Special Education Program were used as determinants.

The purpose for the reviews was to provide an unbiased external observation of Special Education procedures and to offer instructional assistance in areas that may need attention to augment exceptional student programming.

OBSERVATIONS

The following observations are based on the review of ten (10) randomly selected Education student folders. Discussions with the Special Education Teachers and a review of the instructional process utilized to address the established goals for each student were also closely scutinized to determine alignment with I.E.P. objectives. The following observations were made:

(1) Of the ten folders reviewed, all psychological evaluation nearing the expiration date. Re-evaluation procedures need to be addressed in the near future.

(2) Some of the referral forms were missing. Of the forms available, referral dates were omitted and documentation justifying inferences was not present.

(3) Parental permission forms for student evaluations were not completely filled out. Signatures of school officials were omitted and there was no documentation indicating parents had been informed in their primary language of the meaning(s) and/or reasons for the evaluation.

(4) No where in the psychological evaluation was it indicated that the child's primary language had been determined and/or whether the evaluation had been administered in the student's primary language.

(5) Many of the folders provided little information about the multidisciplinary meeting. The date of the meeting was not indicated on many, nor who were present, and what was discussed was not included. There was no indication, the parent, if present, was informed in their primary language or that they understood the process.

(6) No documentation reflecting the fact that bi-annual reports of the student's process had been submitted to the parents to reflect any success or failures in relation to the I.E.P. objectives.

(7) Many of the I.E.P.'s from previous years were omitted.

(8) No annual pretest-posttest, sequence indicating student progression relation to the I.E.P.'s was available.

(9) Although appropriately signed letters were available indicating that the parent(s) was informed of their

rights for due process, etc. there was no documentation indicating the information had been explained in the parent's primary language.

(10) No instrumentation was in the folders to support evaluation results.

(11) No where on the current I.E.P.'s were their goals from the regular teacher or for unidentified behavioral problems. If the child is in a regular class and is performing below class standards, the regular teacher has to provide a goal and objectives for instruction.

(12) At the completion of a specific objective (STEP) or the I.E.P., the teachers has not provided documentation, indicating the level of the performance for the objective.

(13) Placement forms were present, but there is no indication of how placement was arrived at or who agreed or disagreed with the placement.

(14) There were no physical screening data in some of the folders, i.e., vision, hearing.

(15) Related services need to have goals and objectives along with documentation on each I.E.P.

In reviewing the selected student I.E.P.'s with the Special Education Teacher, it was determined that objectives were being met and instruction was adequate for student progress. Therefore, it can be concluded that the Special Education Program of School J is instructionally superior with great pains being taken to appropriately serve the exceptional child.

CONCLUSIONS

Based upon the one day of ten randomly selected exceptional student folders, discussions with the teachers, and a review of instructional practices utilized for the attainment of the I.E.P. goals, it would seem that School J Special Education Program is meeting the needs of each student although folders were haphazardly put together, data was available to support compliance with the P.L. 94-142 mandate. Instruction is the primary asset of the program. All instruction seems to be geared toward attaining the determined I.E.P. goals with each exceptional child being serviced at the best of the teacher's ability.

RECOMMENDATIONS

It is the recommendation of the investigators for School J Special Education Program to initiate the following in order to augment programming:

(1) Special Education Teachers, regular teachers, and support personnel should document the student's progress and completion of objectives.

(2) Parents should be made more aware of their child's progress through procedures that promote primary language communication.

(3) Annual Pretest-Posttest procedures should be administered to every student with results compiled to validate student progress.

(4) All school personnel need to give more attention to detail in completing forms and expediting reports.

(5) The already mentioned observations be remediated and/or incorporated into future programming.